

ZIEGLER, ZIEGLER & ASSOCIATES LLP

COUNSELORS AT LAW
570 LEXINGTON AVENUE
24TH FLOOR
NEW YORK, NEW YORK 10022

(212) 319-7600
TELECOPIER (212) 319-7605
ZZALAW.COM

June 9, 2025

Hon. Denise L. Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: James Papa v. Computacenter United States, Inc. et al
Case # 25 cv 03788

Dear Judge Cote:

We are legal counsel to plaintiff James Papa ("Plaintiff") in the above referenced case. On May 28, 2025, defendant Computacenter United States Inc. ("CC") and defendants Deutsche Bank Securities, Inc., DB USA Corporation and Deutsche Bank AG (collectively referred to herein as "DB") each filed motions to compel arbitration or, in the alternative, to dismiss Plaintiff's claims ("Defendants' Motions"). On May 30, 2025, Your Honor set out a motion schedule for Defendants' Motions calling for Plaintiff's opposition to Defendants' Motions to be served by June 20, 2025 and for CC's and DB's reply to served by July 4, 2025. On June 4, 2025, Plaintiff filed a motion to remand this case to New York State Supreme Court alleging that this Court lacks subject matter jurisdiction due to lack of diversity of citizenship and due to procedural failures committed by CC in the removal process itself (the "Remand Motion"). On June 5, 2025, Your Honor set out a motion schedule for the Remand Motion calling for CC's and DB's opposition to the Remand Motion to be served by June 13, 2025 and for Plaintiff's reply to be served by June 20, 2025.

The issues of resolving whether this Court has subject matter jurisdiction over this case and whether CC properly complied with the procedures to remove this case to this Court are before Your Honor in the pending Remand Motion. The Defendants' Motions are dispositive motions which would require Plaintiff to significantly engage in the litigation of this case before Your Honor has determined whether this Court has jurisdiction over the case. For this reason, Plaintiff respectfully requests that Defendants' Motions be stayed until such time as the Court renders a decision on the Remand Motion. I have conferred with counsel for both CC and DB and requested that they join in a request to stay Defendants' Motions pending a decision on the Remand Motion, but counsel for CC and DB informed me that they are opposed to such stay.

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Despite CC's and DB's opposition, Plaintiff respectfully requests that Your Honor issue such stay.

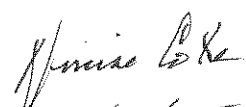
Despite opposing Plaintiff's request for a stay of Defendants' Motions, counsel for CC and DB have graciously agreed to a proposed modification of the existing motion schedule, at my request, for the Remand Motion. This modification would require CC's and DB's opposition to the Remand Motion to be served by June 20, 2025, and Plaintiff's reply would be required to be served by June 27, 2025. Should Your Honor not issue the stay requested by Plaintiff, counsel for CC and DB have agreed to a proposed modified motion schedule for the Defendants' Motions calling for Plaintiff's opposition to Defendants' Motions to be served by August 1, 2025 and for CC's and DB's reply to be served by August 14, 2025.

Thank you for Your Honor's consideration of the request made herein.

Very truly yours,



Christopher Brennan

*The stay is denied. The
opposition to the motion to
remand is due June
20; the reply is due
June 27. 
6/10/25*